

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: FRANK GARCIA JR  
KATHY H GARCIA

) Case No. 20 B 09194  
)  
Debtors ) Chapter 13  
)  
) Judge: JACK B SCHMETTERER

**NOTICE OF MOTION**

FRANK GARCIA JR  
KATHY H GARCIA  
226 WHITEWOOD DR  
STREAMWOOD, IL 60107

CUTLER & ASSOC  
via Clerk's ECF noticing procedures

Please take notice that on July 01, 2020 at 11:00 am my designee or I will appear before the Honorable Judge JACK B SCHMETTERER at 219 South Dearborn Courtroom 682, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on May 28, 2020.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On April 12, 2020 the Debtors filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtors has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Schedule I to complete employer information and Plan to insert tax return language.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,  
/s/ Tom Vaughn

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
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